

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF KENT

ALICIA VILLEGAS, ANA
VILLEGAS, RAQUEL VILLEGAS,
and LIZZETTE VILLEGAS.

Plaintiffs,

Case No: 07- ⁰¹⁹⁹⁸ -NI

v

Hon.

DAVID R. COATS and
SPIRIT-MILLER TRUCKING L.L.C.,

PAUL J. SULLIVAN

Defendants.

(P-24139)

John D. Tallman (P32312)
Attorney for Plaintiff
4020 East Beltline Ave., NE, Suite 101
Grand Rapids, MI 49525
(616) 361-8850

COMPLAINT

There is no other pending or resolved civil
action arising out of the same transaction or
occurrence alleged in the complaint.

Plaintiffs Alicia Villegas, Ana Villegas, Raquel Villegas, and Lizzette

Villegas, by their attorney, John D. Tallman, for their complaint against Defendants states as
follows:

1. That Plaintiffs are residents of Kent County, Michigan.
2. That Defendant Coats is a resident of Union Star, Missouri.
3. That Defendant Spirit-Miller Trucking is a Missouri corporation.

4. That the amount in controversy exceeds \$25,000.00.

5. That on June 12, 2004, Plaintiffs were proceeding east in their vehicle on Interstate 80 (Ohio Turnpike) near Mile Post 197. Defendant Coats, who was also eastbound on Interstate 80 (Ohio Turnpike), driving a semi tractor-trailer owned by Defendant Spirit-Miller Trucking, improperly changed lanes and forced Plaintiffs' vehicle off the roadway and into the median wall. Defendant Coats then left the scene.

6. That as a result of the crash, Plaintiff Alicia Villegas suffered the following injuries:

- a. fractured sternum;
- b. bruised heart;
- c. back and neck injuries;
- d. leg injuries;
- e. other injuries;
- f. physical pain and suffering;
- g. mental anguish;
- h. fright and shock;
- i. denial of social pleasure and enjoyments;
- j. embarrassment, humiliation, and mortification;
- k. disability and disfigurement;
- l. medical expenses;
- m. wage loss and loss of earning capacity; and

n. miscellaneous expenses.

7. That as a result of the crash, Plaintiff Ana Villegas suffered the following injuries:

- a. fractured vertebra of her lumbar spine;
- b. other injuries;
- c. physical pain and suffering;
- d. mental anguish;
- e. fright and shock;
- f. denial of social pleasure and enjoyments;
- g. embarrassment, humiliation, and mortification;
- h. disability and disfigurement;
- i. medical expenses;
- j. wage loss and loss of earning capacity; and
- k. miscellaneous expenses.

8. That as a result of the crash, Plaintiff Raquel Villegas suffered the following injuries:

- a. lumbar strain;
- b. chest wall contusion;
- c. lacerations and bruises;
- d. other injuries;
- e. physical pain and suffering;

- f. mental anguish;
- g. fright and shock;
- h. denial of social pleasure and enjoyments;
- i. embarrassment, humiliation, and mortification;
- j. disability and disfigurement;
- k. medical expenses;
- l. wage loss and loss of earning capacity; and
- m. miscellaneous expenses.

9. That as a result of the crash, Plaintiff Lizzette Villegas suffered the following injuries:

- a. lacerations and bruises;
- b. other injuries;
- c. physical pain and suffering;
- d. mental anguish;
- e. fright and shock;
- f. denial of social pleasure and enjoyments;
- g. embarrassment, humiliation, and mortification;
- h. disability and disfigurement;
- i. medical expenses;
- j. wage loss and loss of earning capacity; and
- k. miscellaneous expenses.

10. That Defendant Coats owed to Plaintiffs the following duties:

- a. to use due care and caution in the operation of his vehicle , in general, and specifically, while changing lanes;
- b. to remain on the scene of personal injury accidents caused by him and to render assistance.

11. That Defendant Coats breached these duties.

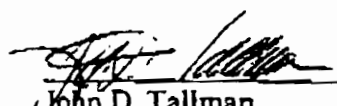
12. That the breach of these duties was a proximate cause of Plaintiffs' injuries.

13. That Defendant Coats was an employee of Defendant Spirit-Miller Trucking and was engaged in his employment duties at the time of the accident which is the subject of this lawsuit.

WHEREFORE, Plaintiffs requests judgment against Defendants in whatever amount she is found to be entitled, plus interest, costs, and attorney fees.

Dated: February 21, 2007

Signed:



John D. Tallman
Attorney for Plaintiffs

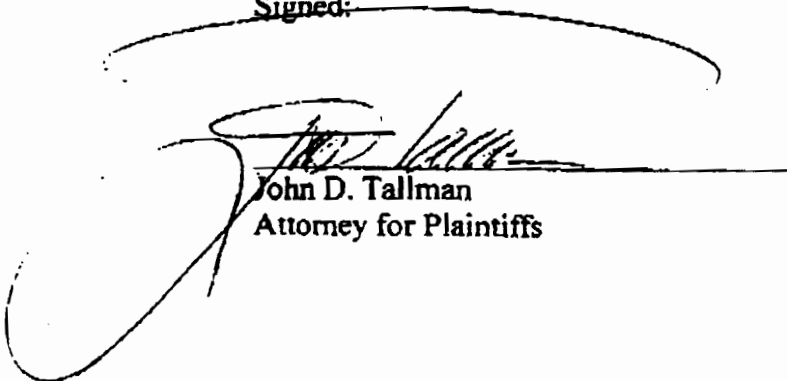
JURY DEMAND

Plaintiffs, Alicia Villegas, Ana Villegas, Raquel Villegas, and Lizzette

Villegas, hereby demands trial by jury.

Dated: February 21, 2007

Signed:



John D. Tallman
Attorney for Plaintiffs